

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

IN RE FLINT WATER LITIGATION

Case No. 5:16-cv-10444-JEL-MKM
Hon. Judith E. Levy

This Document Relates To:

Waid et al. v. Snyder et al.

Case No. 5:16-cv-10444-JEL-MKM

**DEFENDANTS VEOLIA NORTH AMERICA, LLC, VEOLIA NORTH
AMERICA, INC., AND VEOLIA WATER NORTH AMERICA
OPERATING SERVICES, LLC'S SUBMISSION REGARDING NON-
PARTIES AT FAULT**

Pursuant to the Court's Order Regarding Certified Class Issues dated November 1, 2022 (ECF No. 2249), Defendants Veolia North America, LLC, Veolia North America, Inc., and Veolia Water North America Operating Services, LLC (collectively, VNA), advise the Court that they will seek to have the jury assign fault to the following non-parties in the upcoming issues-class trial:

- The U.S. Environmental Protection Agency
 - Susan Hedman
- State of Michigan
- Governor's Office
 - Richard Snyder
 - Dennis Muchmore
 - Richard Baird
- Michigan Department of Treasury

- Andy Dillon
- Wayne Workman
- Michigan Department of Environmental Quality
 - Dan Wyant
 - Liane Shekter-Smith
 - Bradley Wurfel
 - Richard Benzie
 - Stephen Busch
 - Adam Rosenthal
 - Patrick Cook
 - Michael Prysby
 - Jim Sygo
- Michigan Department of Health and Human Services
 - Nicolas Lyon
 - Eden Wells
 - Nancy Peeler
- Genesee County Drain Commissioner
 - Jeff Wright
- The City of Flint
 - Dayne Walling
- Flint Department of Public Works

- Howard Croft
- Daugherty Johnson
- Brent Wright
- Michael Glasgow
- Ed Kurtz
- Darnell Earley
- Gerald Ambrose
- Flint Receivership Transition Advisory Board
- Rowe Professional Services

VNA reserves the right to supplement this list if warranted by developments in the case, such as any settlement, or by the evidence uncovered in discovery or at trial.

Respectfully submitted,

CAMPBELL, CONROY & O'NEIL P.C BUSH SEYFERTH PLLC

/s/ James M. Campbell

James M. Campbell
Alaina N. Devine
20 City Square, Suite 300
Boston, MA 02129
(617) 241-3000
jmcampbell@campbell-trial-lawyers.com
adevine@campbell-trial-lawyers.com

/s/ Cheryl A. Bush

Cheryl A. Bush (P37031)
100 W. Big Beaver Road, Suite 400
Troy, MI 48084
(248) 822-7800
bush@bsplaw.com

*Attorneys for Veolia North America, LLC, Veolia North America, Inc., and
Veolia Water North America Operating Services, LLC*

Dated: November 29, 2022

CERTIFICATE OF SERVICE

I hereby certify that on November 29, 2022, I electronically filed the foregoing document with the Clerk of the Court using the ECF System, which will send notification to the ECF counsel of record.

Respectfully submitted,

/s/ James M. Campbell